

# **EXHIBIT 3**

## **Proposed Order**

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
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11 *In re: Volkswagen 'Clean Diesel' Marketing,*  
12 *Sales Practices, and Products Liability*  
13 *Litigation*

14 This document relates to:

15 *Iconic Motors, Inc., et al. v. Volkswagen*  
16 *Group of America, Inc., et al., No. 3:17-cv-*  
17 *3185-CRB*  
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LEAD CASE No. 15-md-02672-CRB

**[PROPOSED] ORDER GRANTING  
BOSCH DEFENDANTS'  
ADMINISTRATIVE MOTION TO SEAL**

Hon. Charles R. Breyer

1 Having considered the Bosch Defendants' February 21, 2025 Administrative Motion to  
 2 Seal (the "Motion"), the Court hereby grants the Motion pursuant to Local Rule 79-5(c)-(f).

3 IT IS HEREBY ORDERED THAT the following materials, or portions thereof, may be  
 4 filed under seal:

Document	Sealable Portions
<b>Group Exhibit E to Plaintiff Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments, Inc.'s Opposition to Robert Bosch GmbH and Robert Bosch LLC's Motion for Summary Judgment</b>	Redacted Portions of Document

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13 **IT IS SO ORDERED.**

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15 Dated: \_\_\_\_\_, 2025

16 \_\_\_\_\_  
 17 The Honorable Charles R. Breyer  
 18 UNITED STATES DISTRICT JUDGE  
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